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March 9, 2001

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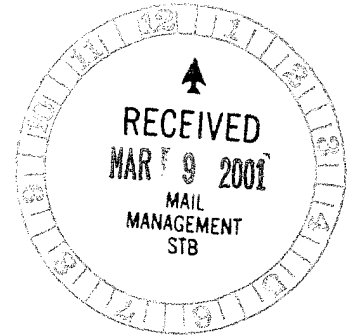
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**By Hand Delivery**

Surface Transportation Board  
Office of the Secretary  
Case Control Unit  
1925 K Street, N.W.  
Washington, DC 20423-0001

**ENTERED**  
**Office of the Secretary**  
**MAR - 9 2001**  
**Part of**  
**Public Record**



Re: STB Ex Parte 582 (Sub-No.1) Oral Argument

Dear Mr. Williams:

Pursuant to the Board's Order served February 23, 2001, the "Allied Rail Unions" (the Brotherhood of Railroad Signalmen; International Brotherhood of Boilermakers, Blacksmiths, Iron Ship Builders Blacksmiths Forgers and Helpers; National Council of Firemen and Oilers/SEIU; Sheet Metal Workers International Association, and the Transport Workers Union of America) hereby advise the Board of their desire to participate in the oral argument scheduled for April 5, 2001 in the above-referenced matter through their counsel Richard S. Edelman. The Allied Rail Unions will address the following issues: public interest benefits, safety in operations, and "cramdown", and believe that their presentation would require ten (10) minutes. However, these unions plan to participate in the presentation made by the Transportation Trades Department, AFL-CIO-- Rail Labor Division. The RLD has requested thirty (30) minutes of argument time for the RLD and its affiliates for a coordinated presentation. The Allied Rail Unions do not seek any argument time in addition to that requested by the RLD.

Sincerely,  
O'Donnell, Schwartz & Anderson, P.C.

By

Richard S. Edelman

cc: All counsel of record